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DOCKET NO.
04-00008

Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

January 5, 2004

Re: Petition for 2-1-1

Dear Chairman Tate,
Enclosed is the original and 14 copies of Memphis-Shelby County Public Library & Information Center's petition for 2-1-1 designation signed by Judith Drescher, Director. A check for the \$25.00 fee is affixed to this letter. Should there be any questions or follow-up needed please contact me at the address below or at www.reidr@memphis.lib.tn.us. My direct telephone number is 901-415-2716. We look forward to the remainder of the application process and the hearing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron'.

Ronald E. Reid
Senior Agency Manager
LINC Department

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

PAID T.R.A.	
Chk #	<u>98390</u>
Amount	<u>25.00</u>
Rcvd By	<u>LR</u>
Date	<u>1-8-04</u>

**IN RE:
PETITION OF THE MEMPHIS-SHELBY
COUNTY PUBLIC LIBRARY AND
INFORMATION CENTER FOR
ALLOCATION OF AN N11 NUMBER
(ABBREVIATED DIALING CODE)**

TRA Docket No. 04-00008

PETITION FOR ALLOCATION OF AN N11 NUMBER

The Memphis-Shelby County Public Library and Information Center ("Petitioner"), respectfully submits this Petition for Allocation of a 211 Number pursuant to BellSouth Telecommunications, Inc. General Subscriber Services Tariff § A39 Abbreviated Dialing.

INTRODUCTION

1. Petitioner was founded under ordinance by the City of Memphis as a community organization described in number two following.
2. Petitioner provides public library services in Memphis and Shelby County and more specifically provides community information and referral services throughout the Memphis-Shelby County Area as a public entity as permitted under the Public Acts of 1963, Chapter 370, codified in section 10-301 of the TENNESSEE CODE ANNOTATED.

NUMBERING RESOURCE AS TO WHICH ALLOCATION IS SOUGHT

3. Petitioner seeks allocation of the 211 abbreviated dialing code for Shelby, Lauderdale, Tipton and Fayette County, (the "Proposed Coverage Area").

STANDARD FOR GRANT OF PETITION

4. In its July 31, 2000 Order (the "FCC Order"), CC Docket No. 92-105, ¶ 2, the Federal Communications Commission (the "FCC") expressly reserved the 211 abbreviated dialing code for "community information and referral services."

5. Pursuant to the October 20, 1993 Order (the "TRA Order"), Docket No. 92-13892, issued by the Tennessee Public Service Commission, the following factors and criteria are used to select the most qualified applicant for an allocation of N11 number resources: (i) overall financial fitness, both historical and future; (ii) overall ability (technical ability and otherwise) and willingness to provide service on a permanent and continuous basis; (iii) ability and willingness to abide by Tennessee Regulatory Authority ("TRA") rules and policies; (iv) rates, services and collection practices to be utilized by petitioner in the provision of N11 service; (v) extent and duration of petitioner's service to the local community included in the N11 allocation; (vi) anticipated future uses by the community of the proposed service to be offered by the petitioner and the petitioner's overall experience providing information to the community to be served; and (vii) the type of information services to be provided by petitioner through an abbreviated dialing code, and its relative value to the public and local community. In addition, a petitioner for allocation of N11 number resources must agree to abide by the terms, conditions and rates for N11 service, which shall not exceed those set forth in the applicable Tariff.

REASONS SUPPORTING ALLOCATION OF N11

6. Petitioner seeks to utilize the 211 abbreviated dialing code for provision of community information and referral services, pursuant to the TRA Order and FCC Order.

7. Although, pursuant to a previous TRA ruling, the 211 abbreviated access code for the Memphis metropolitan exchange had been assigned to National Telephone Enterprises for voice personal dating, the subsequent FCC Order effectively recalls that assignment, reserving the 211 abbreviated access code for "community information and referral services." Such "community information and referral services" specifically are the type of services that Petitioner proposes to provide through the abbreviated access number.

8. Petitioner satisfies the criteria set forth in the TRA Order:

(a) Overall Financial Fitness, Both Historical and Future. The mission of the Memphis-Shelby County Public Library & Information Center, founded in 1893, is “to satisfy the customer’s need to know”. The library system currently has a Central Library and 22 branches located throughout Shelby County, three mobile branches (JobLINC, Training Wheels and InfoBus), FM 89.3 WYPL radio and WYPL TV-18. The library is the only library system in the country with a radio and a television station. The library’s LINC department will incorporate the 2-1-1 program within its 28 year old Community Information and Referral Service. The library system is recognized as a cutting-edge leader by the American Library Association, the Public Library Association and the Urban Libraries Council. Judith Drescher, Director of Libraries is past president of the Public Library Association and has served on many strategic committees of each of these associations. Sallie Johnson, Deputy Director of the Library, is past president of the Memphis Library Council and Tenn-Share (a Tennessee Libraries collaborative). Kay Due, Manager of Central Library is President-Elect of the Tennessee Library Association and Ron Reid, Senior Agency Manager of the LINC Department that will operate the 2-1-1 program, is President of the Tennessee Alliance of Information and Referral Systems (TNAIRS). The library system has in excess of 3.5 million visits annually (more than Graceland, The Zoo and the Pink Palace combined).

As reported in Petitioner’s 2001-2002 Annual Report, the library system receives 92.3% of its \$19.4 million funding from public funds, 1.7% from grants and donations and 6% from other sources (fines, fees and interest). The Foundation for the Library is a 501 (c) (3) that seeks private funding for the library system and has raised \$21.5 million in the past 5 ½ years in support of library services. The Petitioner will utilize the Foundation to solicit additional funding from corporate and individual donors. The library will provide additional staff and the general operating costs as needed on an in-kind basis. Petitioner’s 2001-2002 annual report and

proposed budget for the service for the first and second years of operation are attached as Exhibits A and B, respectively.

(b) Overall Ability (Technical Ability and Otherwise) and Willingness to Provide Service on a Permanent and Continuous Basis. If allocated an abbreviated dial code, Petitioner will provide 211 service as a public service on a permanent and continuous basis.

(c) Ability and Willingness to Abide by TRA Rules and Policies. Petitioner will comply with all present and future rules promulgated by the TRA, including without limitation those applicable to abbreviated access dialing service. At the September 25, 2003 Library Board of Trustees meeting, the TRA Petition was reviewed and endorsed enthusiastically as a natural extension of library services which will benefit the entire community.

(d) Rates, Services and Collection Practices to Be Utilized by Petitioner in the Provision of N11 Service. As described in Paragraph 1, above, Petitioner is a public entity committed to providing free community information and social service referral services to the population of the Proposed Coverage Area. Petitioner proposes to pay all charges incurred in connection with the assignment and utilization of the abbreviated access code and the costs of ongoing operation of the abbreviated access number service, other than any applicable user-generated charges resultant from access to the service by cellular phone.

(e) Extent and Duration of Petitioner's Service to the Local Community Included in the 211 Allocation. Since 1893, Petitioner has been committed to community service in the Memphis and Shelby County area and has developed a close relationship with social service providers in the Proposed Coverage Area in a cooperative effort to enhance and improve the delivery of beneficial services to the community. More specifically, at the community's request in 1975, Petitioner organized the community's first comprehensive Community Information and Referral Service. Today the Petitioner's Community Information and Referral

Service provides over 12,000 inquiries annually utilizing a community information data base (<http://www.memphislibrary.org/inform/index11.htm>) with over 2,000 listings. The provision and support of a 211 access service code for Memphis area residents aligns with the mission and historical service commitment of The Memphis-Shelby County Public Library and Information Center.

(f) Anticipated Future Uses by the Community of the Proposed Service to Be Offered by the Petitioner and the Petitioner's Overall Experience Providing Information to the Community to Be Served. As described above in paragraph 8 (e), petitioner has a long history of providing information to the Memphis and Shelby County community. Moreover, Petitioner anticipates that its ongoing strong relationship with social services and community information concerns will continue. The availability of a uniform telephone access number for community information and social services would significantly reduce confusion or frustration regarding the services available in the Memphis and Shelby County area. The 211 access number will also enhance the likelihood that people in need of assistance will be directed to those specific services that would be most appropriate for and responsive to their needs. Therefore, it is anticipated that a significant number of residents will utilize the abbreviated access code system proposed by Petitioner. Although difficult to project a precise number of inquiries the first year of 2-1-1 operation, Petitioner expects between 40,000 and 50,000 calls. This projection is based on suggested calls per thousand population formulas developed by the Atlanta United Way 2-1-1 and by actual 2-1-1 agency experience surveyed in 2002 by Dan Williams, National 2-1-1 Director. The agencies with at least one year of experience reported inquiries equaling 3-5% of the service area population the first year.

(g) The Type of Information Services to Be Provided by Petitioner Through an Abbreviated Dialing Code, and its Relative Value to the Public and Local Community.

Through the abbreviated access number service, Petitioner would serve the population of the Proposed Coverage Area, providing free information regarding community service organizations and referral guidance to individuals seeking social services and other assistance. A single, easy to access, and comprehensive resource, such as the proposed service to be offered by Petitioner through the 211 abbreviated access number, would tend to reduce any confusion or lack of information among citizens of the Proposed Coverage Area concerning the availability of social and community services from the hundreds of community service organizations located therein. Thus, through the institution of Petitioner's abbreviated access number service, individuals in need of social or community service would have access to an effectively increased amount of social services which would be available on a more uniform basis. In addition, Petitioner anticipates that current high usage of 911 abbreviated access number resources would be ameliorated by operation by Petitioner of the free information and referral service. Collectively attached hereto as Exhibit C, are supporting letters.

(h) Agreement to Abide by Terms, Conditions and Rates for 211 Service. Petitioner agrees to abide fully by the terms, conditions and rates for 211 service set by the TRA and embodied in the Tariff. As described above in Paragraph 8(d), Petitioner expects to bear all costs of operating the 211 service, other than cellular phone connection and time charges.

CONCLUSION

9. Petitioner respectfully requests that the TRA allocate the 211 abbreviated dialing code for the Proposed Coverage Area to the Memphis-Shelby County Public Library & Information Center and that the TRA grant such other relief as it deems necessary and proper.

Date:

12/31/03

Respectfully submitted,

Julian G. Drescher

